

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

**MATTHEW MCDONALD, and
MCDHOLDINGS, LLC,**

Plaintiffs,

v.

**EDWARD G. ROBINSON III, EDWARD
G. ROBINSON III CONSULTING, LLC,
CARLA DESILVA MCPHUN, CADEM
CAPITAL GROUP, CHOICE
MANAGEMENT, LLC, and CHRISTIAN
E. D'ANDRADE,**

Defendants.

Civil Action No. 1:18-CV-00697-LMB/TCB

**OMNIBUS MOTION FOR ENTRY OF DEFAULT JUDGMENTS
AGAINST D'ANDRADE AND MCPHUN DEFENDANTS**

Plaintiffs Matthew McDonald (“McDonald”) and McDHoldings, LLC (“MCDH,” or, collectively with McDonald, “Plaintiffs”), by and through the undersigned counsel and pursuant to Fed. R. Civ. P. 55, hereby move for default judgment against Defendants Carla DeSilva McPhun (“McPhun”), Cadem Capital Group (“Cadem”), Choice Management, LLC (“Choice Management”), and Christian E. D’Andrade (“D’Andrade”);¹ jointly and severally in the amounts of \$1,365,568.65 for compensatory damages, treble damages, as authorized by 18 U.S.C. § 1964(c) and Va. Code Ann. § 18.2-500, and \$395,532.91 for attorneys’ fees and costs, plus interest. In total, Plaintiffs move for default judgment in the amount of \$4,492,238.87, plus interest.

¹ Defendants McPhun, Cadem, and Choice Management are collectively referred to herein as the “McPhun Defendants.” The McPhun Defendants and D’Andrade are collectively referred to herein as “Defendants.”

Dated: December 13, 2018

Respectfully submitted,

/s/ *Cathy A. Hinger*

Cathy A. Hinger (VSB No. 46293)
Lela M. Ames (VSB No. 75932)
Pascal F. Naples (VSB No. 87849)
WOMBLE BOND DICKINSON (US) LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036
Tel: (202) 857-4489
Fax: (202) 261-0029
E-mail:Cathy.Hinger@wbd-us.com
E-mail:Lela.Ames@wbd-us.com
E-mail: Pascal.Naples@wbd-us.com

and

Jackson R. Price (*pro hac vice*)
WOMBLE BOND DICKINSON (US) LLP
One Wells Fargo Center, Suite 3500
301 South College Street
Charlotte, NC 28202
Tel: (704) 331-4990
Fax: (704) 343-4851
E-mail:Jackson.Price@wbd-us.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this the 13th day of December, 2018, a copy of the foregoing **PLAINTIFFS' OMNIBUS MOTION FOR ENTRY OF DEFAULT JUDGMENTS AGAINST D'ANDRADE AND MCPHUN DEFENDANTS**, was filed with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

Richard Carnell Baker
Baker Simmons
2120 L St., NW, Ste. 305
Washington, DC 20037
E-mail: richardcbaker@aol.com

Jack Hanly
Grace L. Hill
Assistant United States Attorneys
2100 Jamieson Ave.
Alexandria, VA 22314
grace.hill@usdoj.gov

*Attorney for Defendants Edward G. Robinson
and Edward G. Robinson III Consulting, LLC*

Attorneys for Intervenor

Carla D. McPhun
16913 Harbour Town Drive
Silver Springs, MD 20905
E-mail: carladmcphunlegal@gmail.com

Pro Se, Individually and for Cadem Capital Group and Choice Management, LLC

Via Federal Express for delivery on December 14, 2018 on the following:

Christian D'Andrade
642 North L Street
Unit B
Livermore, CA 94550

Pro Se

Chambers copy via FedEx, for delivery on December 14, 2018, on the following:

U.S. District Court, Eastern District of Virginia
Clerk's Office
Attn: Hon. Theresa C. Buchanan
401 Courthouse Square
Alexandria, VA 22314

/s/ *Cathy A. Hinger*
Cathy A. Hinger